

11th July 2022

J5413C

City of Sydney
Town Hall House
No. 456 Kent Street
Sydney NSW 2000

Re: DA22/1839 | George Street Overpass, The Rocks

This letter has been prepared at the request of JCDcaux in response to submissions, dated 4 May 2022, by City of Sydney Council and Place Management NSW for DA22/1839 at George Street Overpass, the Rocks. Approval subject to conditions was granted by the Heritage Council of NSW on 27 May 2022. This letter should be read in conjunction with the Heritage Impact Statement prepared for the Development Application in February 2022 by Weir Phillips Heritage and Planning and other supporting documentation prepared for the Development Application.

The site is located within the City of Sydney. The principal planning control for the site is the *Sydney Local Environmental Plan 2012 (LEP 2012)*. The site of the proposed works, comprising the Circular Quay Railway Viaduct, is owned by, and is listed as a heritage item on the s170 Register of the Transport Asset Holding Entity. The viaduct is also listed on the State Heritage Register under the *NSW Heritage Act 1977* as part of the listing for the Circular Quay Railway Station Group. The viaduct is also located within the vicinity of heritage items and Conservation Areas listed on the s170 Register of Property NSW and by Schedule 5 Parts 1 and 2 of the *LEP 2012*.

Site Location

The site of the proposed signage is the southern side of the Circular Quay Viaduct, at the point where it crosses over George Street, the Rocks (Figure 1).



Figure 1: Site location (indicated by the red arrow).
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Site Assessment

George Street is a major city thoroughfare that runs through the city from its junction with Hickson Road at Dawes Point in the north to its junction with Broadway in the south. The street generally runs in a north-south direction; numerous deviations along its length create contained vistas along the street. The street is generally lined with conjoined and closely spaced buildings along its length.

The proposed signage site on the Circular Quay Viaduct is located near the intersection of George Street with Alfred Street. The character of George Street to the north and south of the viaduct differs. On the southern side, lie the high-rise commercial buildings and international hotels of the Central Business District (CBD). The majority of these buildings were constructed within the last 30 years. The footpaths to either side are wide and paved and the street lined with young street trees; flagpoles and traffic management devices/road signs are prominent streetscape elements.

On the northern side of the viaduct lies The Rocks. This section of George Street lies within the George Street North Conservation Area. The western side of the street is comprised of mid and late nineteenth century buildings and hotels, many of which are listed as individual heritage items on Property NSW's *s170 Register*. On the eastern side, immediately beyond the viaduct, is First Fleet Park and the former Maritime Services Buildings, now the Museum of Contemporary Art, a fine example of interwar period architecture.

The area beneath the viaduct itself is paved. There are views from beneath the structure to Circular Quay and the Harbour.

The Circular Quay Viaduct comprises a 12-span structure of riveted plate web girders and concrete slabs and rubber pads supporting the tracks to deaden the noise. It supports the railway tracks of the City Circle railway. Above lies the Cahill Expressway. The whole is supported by massive, round stone pylons. The section of viaduct the location of the proposed works is shown by Figure 2.



Figure 2: The Circular Quay Viaduct as it crosses George Street, looking north showing the existing signage.

JCDecaux.

Statutory Listings

The site:

- Is listed on the State Heritage Register under the *NSW Heritage Act 1977* ('Circular Quay Railway Station Group').
- Is listed on the s170 Register of the Transport Asset Holding Entity ('Circular Quay Railway Station and Viaduct').

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- Is not listed as a heritage item by Schedule 5 Part 1 of the *Sydney LEP 2012*.
- Is not located in a Conservation Area by Schedule 5 Part 2 of the *Sydney LEP 2012*.

The State Heritage Register provides the following Statement of Significance for the item:

Circular Quay Station and viaduct are of state significance as the closing section in the city rail loop that was over 40 years in planning and construction. As prominent landmarks across the northern end of the city they serve as a visual boundary between the city and the harbour. The station exhibits aspects of Inter-War Functionalist and some Art Deco stylistic features, completed long after both styles had been largely discontinued in major urban architectural form, reflecting the pre-war planning of the station and the subsequent delays in construction. The station design and location have been subject to ongoing analysis and debate and have remained controversial in Sydney's planning history. The use of riveted technology as part of the viaduct represents the last phase of this construction technique in Sydney railway infrastructure.¹

Refer to Figure 3 which shows State and local heritage items in relation to the site.

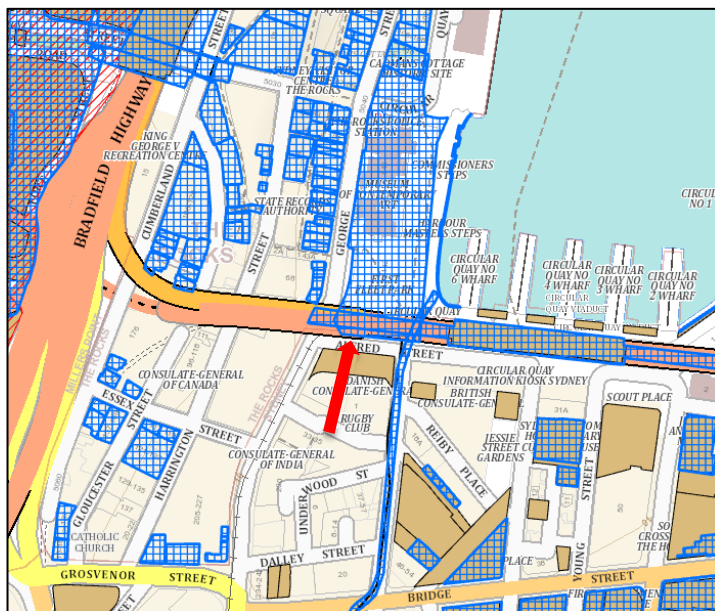


Figure 3: Map showing State (hatched blue) and local (coloured brown) items. The site is indicated by the red arrow.

NSW Planning Portal

Issues

The following sets out the issues raised by City of Sydney Council and Place Management NSW and the response by Weir Phillips Heritage and Planning:

City of Sydney Council:

1. The site is listed as a State heritage item known as 'Circular Quay Railway Station group' which includes the Circular Quay viaduct. The site is also located within the immediate vicinity of numerous State and Local listed heritage items and is in a highly prominent location as being a gateway to The Rocks.

¹ 'Circular Quay Railway Station group', Heritage NSW State Heritage Register ID No. 5011971.

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- 2. The Heritage Impact Statement prepared by Weir Phillips Heritage and Planning acknowledges that the viaduct is a significant element in the George Street North and Alfred Street streetscape and frames view corridors to and from Circular Quay into and out of the City. The City defers to NSW Heritage for detailed comment, however concern is raised regarding the adverse impact of changing illuminated LED signage in this location.*
- 3. The City disagrees that the changeover of advertising on the LED screen on a 10 second basis 'will not introduce any new impacts on the heritage significance of the viaduct'. Rather, the City considers that the changing illuminated signage in this location will have negative visual impact on the setting and views to and from the heritage item and, as acknowledged in the Heritage Impact Statement, will impact on the heritage items and special character areas within the City of Sydney to the south of the site.*

While it is accepted that the viaduct frames view of Circular Quay and the Rocks, it is also an element that, due to its bulk and scale, restricts view corridors towards the historic streetscape that lies beyond. This is compounded by streetscape elements on the south side of George Street, including contemporary high-rise buildings, trees and traffic management devices. The most significant view corridors towards Circular Quay and the Rocks are obtained on the north side of the viaduct, where the proposed sign will have no visibility, and not the south. The two sides of the street are separated by the viaduct which effectively neutralises any visual relationship between the two.

The streetscape on the south side of the viaduct is highly contemporary and bears little visual relationship with the north side. The heritage items that are on this side are located to the south of the viaduct and frame view of it. The Visual Impact Assessment prepared by Urbis for this Development Application, dated December 2021, demonstrates the sign will present as a background element within a streetscape with numerous elements of greater luminance, and will otherwise have limited visibility due to street trees. Where visible against the viaduct, the signage will present as a recessive element as it is of a much smaller proportion than the viaduct. As the proposal is to reduce the number of signs from two to one, thereby reducing visual clutter and enabling a greater part of the viaduct to be seen, the overall impact will be positive and will allow the viaduct to remain the dominant visual element in relation to the sign.

- 4. On this basis, the proposal is considered to be contrary to objectives (4), (5), (8) and (11) of Section 3.16 of the SDCP 2012. The City is not satisfied that the signage demonstrates design excellence and contributes positively to the significant characteristics of the streetscape. The proposed illumination will result in further impacts to the heritage item and the streetscape and detracts from a high quality pedestrian experience of streets, particularly at this important gateway location into The Rocks. The changes to the existing third party advertising structure has not demonstrated an improved design quality and community benefits.*

The benefit to the south side is the replacement of two existing static signs with one new sign in essentially the same location. The sign will be of similar luminance levels to the existing signs. It will only show static content, however, will change content on a 10-second basis which is considered to have a negligible visual impact and will not generally be discernible for passers-by. Given the existing signage which has been on the viaduct for some time, it is likely Council has accepted there will always be a level of visual impact on the viaduct by having advertising in this location. The proposed sign is to be virtually indistinguishable to the existing; it should be emphasised that the only differences are the ability to change messaging, and internal illumination, both characteristics which are fully compliant.

Place Management NSW:

- 1. The proposed location of the new digital sign occupies a significant threshold entrance into the historic Rocks precinct, one of Australia's most important tourist and cultural places, including government agencies such as Place Management NSW, The Opera House, Overseas Passenger*

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Terminal, Museum of Contemporary Art, Transport for NSW, Royal Botanic Gardens, Destination NSW, as well as a range of arts organisations located within the wider Millers Point area.

Given that northbound traffic movements along this section of George Street have changed the need for the proposed digital sign at this location is further queried.

- 2. The proposed location of the new digital sign should be considered against the broader objectives of the vision for The Rocks including several placemaking projects currently being led by Place Management NSW for The Rocks including The Rocks Heritage Management Plan and The Rocks Wayfinding Strategy.*

The Rocks precinct is an area with competing needs which, as acknowledged by *The Rocks Heritage Management Plan*, requires adaptation to ensure the precinct not only retains its significance but remains a real and contemporary place in which people live, work and visit. The proposal is an opportunity to facilitate high-quality advertising signage that takes advantage of local foot traffic and reflects the broader vision of the Rocks by ensuring visitors can have a 'contemporary experience', as stated by *The Rocks Heritage Management Plan*. The sign has been carefully designed and sited to ensure there is a minimal and acceptable impact on the heritage values of the Rocks precinct.

- 3. Given the State significance of the surrounding locality, it is essential that the design of the sign attachment and frame are well considered and respectful of the architectural style of the bridge/railway viaduct and the aesthetic, historic and contemporary position of The Rocks within the City of Sydney.*

As set out above, the sign will be located on the south side of the viaduct, which splits George Street into two and negates any visual relationship with the north side. Due to this, the sign has been designed in form and materiality to respond to the south side of the viaduct which is highly contemporary, and not the north, where it will have no visibility.

Conclusion

This letter has responded to the submissions by City of Sydney Council and Place Management NSW for DA22/1839 for the George Street Overpass, the Rocks. The proposal will facilitate high-quality signage for advertising and other community messaging in an area with busy foot traffic. It will replace two existing static signs and will have negligible visual impact on both the viaduct and the streetscape on the south side of George Street, while it will have no visibility from the historic streetscape in the Rocks. It will sit within a highly contemporary streetscape that has numerous elements of greater luminance than the sign and will generally present, where not obscured, as visually recessive against the viaduct. For these reasons, it is considered that the impact on the viaduct and the Rocks will be minimal and acceptable.

Further, it is again noted that the proposal has received the approval of the Heritage Council of NSW. Given the works are to an item listed on the State Heritage Register and not on the *LEP 2012*, this approval effectively supersedes the submissions by City of Sydney and Place Management NSW.

Please do not hesitate to contact me on 8076 5317 if you have any questions.

Yours faithfully,



James Phillips | Principal